

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Stream TV Networks, Inc.,¹

Debtor.

Chapter 11

Bky. No. 23-10763 (MDC)

In re:

Technovative Media, Inc.,

Debtor.

Chapter 11

Bky. No. 23-10764 (MDC)

(Jointly Administered)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

Adv. No. 23-00057

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
"BOB" MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S), JANE DOE(S),
DELAWARE and OTHER LAW FIRMS
representing and acting in concert with John
Doe(s) and/or Jane Doe(s), INVESTMENT
BANKS employed by John Doe(s) and/or Jane
Doe(s), PATRIC THEUNE, and SEECUBIC
B.V.,

Defendants.

¹ The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

**MOTION FOR A TEMPORARY RESTRAINING ORDER, PRELIMINARY
INJUNCTION, AND PERMANENT INJUNCTION**

COME NOW, Debtors Stream TV Networks, Inc. and Technovative Media, Inc. (jointly, the “Debtors”), and hereby move the Court, pursuant to Rule 7065 of the Federal Rules of Bankruptcy Procedure, for the entry of a Temporary Restraining Order and, pending a hearing thereon, the entry of a Preliminary Injunction and a Permanent Injunction against Defendants (1) Shadron L. Stastney; (2) SLS Holdings VI, LLC; (3) Hawk Investment Holdings Limited; (4) Arthur Leonard Robert “Bob” Morton; (5) SeeCubic, Inc.; (6) Alastair Crawford; (7) Krzysztof Kabacinski; (8) Kevin Gollop; (9) Asaf Gola; (10) “John Doe(s);” (11) “Jane Doe(s);” (12) Delaware and other law firms representing and acting in concert with “John Doe(s)” and/or “Jane Doe(s);” (13) investment banks employed by the Debtors or “John Doe(s)” and/or “Jane Doe(s);” (14) Patric Theune; and (15) SeeCubic B.V. (collectively, the “Defendants”). The grounds for this motion are fully set forth in the accompanying Memorandum in Support of Motion for a Temporary Restraining Order, Preliminary Injunction, and Permanent Injunction. In support of this motion, Debtors incorporate by reference the entirety of their Original Complaint and accompanying exhibits filed contemporaneously herewith, including the Declarations of Mathu Rajan and Charles M. Robertson, and rely upon the record in this case.

Dated: September 30, 2023

Respectfully submitted,

/s/ Rafael X. Zahralddin

Rafael X. Zahralddin-Aravena (PA Bar No. 71510)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

550 E. Swedesford Road, Suite 270

Wayne, PA 19087

Telephone: (302) 985-6000

Facsimile: (302) 985-6001

Rafael.Zahralddin@lewisbrisbois.com

-and-

Vincent F. Alexander (*pro hac vice*)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
110 SE 6th Street, Suite 2600
Fort Lauderdale, FL 33301
Telephone: (954) 728-1280
Facsimile: (954) 678-4090
Vincent.Alexander@lewisbrisbois.com

-and-

Bennett G. Fisher (*pro hac vice*)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
24 Greenway Plaza #1400
Houston, TX 77046
Telephone: (346) 241-4095
Facsimile: (713) 759-6830
Bennett.Fisher@lewisbrisbois.com

-and-

Keith Kodosky
LEWIS BRISBOIS BISGAARD & SMITH, LLP
600 Peachtree Street NE, Suite 4700
Atlanta, GA 30308
Telephone: (404) 991-2183
Facsimile: (404) 467-8845
Keith.Kodosky@lewisbrisbois.com

(pro hac to be filed)

Counsel to the Debtors